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AUTHOR Anderson, William J.
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ABSTRACT

Although the Juvenile Justice and Delinquency Prevention Act of 1974 does not specify the primary purpose of the Special Emphasis Program, it is generally categorized as serving a dual function of research/demonstration and service delivery. A General Accounting Office (GAO) review was held to determine the efficiency and effectiveness of the management of the program. The results indicated that the Office of Juvenile Justice and Delinquency Prevention did not recognize the need to operate the two programs in a different manner. GAO found that the office's policies and procedures primarily addressed service delivery and virtually ignored research/demonstration. In response to these findings, the Department of Justice, although disagreeing on some points, stated that corrective action would be taken. (JAC)

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Report To The Attorney General

The Office Of Juvenile Justice And Delinquency Prevention's Special Emphasis Program Has Not Realized Its Full Potential

William J. Anderson, Director

The Office of Juvenile Justice and Delinquency Prevention needs to establish policies and procedures for its Special Emphasis Program which recognize that research/demonstration and service delivery initiatives should be designed and managed differently. GAO concluded that unless this was done, the Office would achieve only limited results from its research/demonstration programs.

The Department of Justice, although disagreeing on some points, concurred with GAO's recommendations and stated that corrective action would be taken.

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UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

GENERAL GOVERNMENT
DIVISION

B-202245

The Honorable William French Smith
The Attorney General

Dear Mr. Attorney General:

This report discusses the need for the Office of Juvenile Justice and Delinquency Prevention to establish policies and procedures which recognize that its special emphasis research/ demonstration and service delivery programs should be designed and managed differently.

The report makes recommendations to you on pages 23 and 24. As you know, Section 236 of the Legislative Reorganization Act of 1970 requires the head of a Federal agency to submit a written statement on actions taken on our recommendations to the House Committee on Government Operations and the Senate Committee on Governmental Affairs not later than 60 days after the date of the report and to the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of the report.

We are sending copies of this report to the Director, Office of Management and Budget.

Sincerely yours,

W.J. Anderson

William J. Anderson
Director

GENERAL ACCOUNTING OFFICE
REPORT TO THE ATTORNEY GENERAL

THE OFFICE OF JUVENILE JUSTICE AND DELINQUENCY PREVENTION'S SPECIAL EMPHASIS PROGRAM HAS NOT REALIZED ITS FULL POTENTIAL

D I G E S T

The Office of Juvenile Justice and Delinquency Prevention, the agency responsible for administering the Special Emphasis Program, needs to establish policies and procedures addressing the Program's different mandates.

From fiscal year 1975 through 1981, about $223 million was made available to fund the Special Emphasis Prevention and Treatment Program. Under this program, which is authorized by the Juvenile Justice and Delinquency Prevention Act of 1974, grants and contracts can be awarded for various objectives including

--developing and implementing new approaches, techniques, and methods with respect to juvenile delinquency programs;

--improving the capability of public and private agencies and organizations to provide services for delinquents and other youth to help prevent delinquency; and

--developing and implementing prevention and treatment programs relating to juveniles who commit serious crimes.

Although the act does not specify the Program's primary purpose, it can generally be categorized as serving the dual function of research/demonstration and service delivery. GAO's review, which was made to determine how efficiently and effectively the Office of Juvenile Justice and Delinquency Prevention managed the Special Emphasis Program, showed that the Office did not recognize the need to operate these types of programs differently. GAO found that the Office's policies and procedures primarily addressed service delivery and virtually ignored research/demonstration. (See pp. 1 to 10).

Various studies indicate that several critical elements are involved in successfully implementing a research/demonstration effort. These

elements include: (1) conducting research on a national scope issue; (2) developing a program on the basis of research findings; (3) testing and evaluating the program rigorously; and (4) demonstrating it in several jurisdictions with varying characteristics. Service delivery programs, on the other hand, do not need the same degree of testing and evaluation because their purpose is to address a localized need and not to show that the effort is effective and can be implemented nationwide on a cost effective basis. (See p. 9.)

GAO reviewed three research/demonstration initiatives totaling $31 million in grant or contract awards and found problems with the design and management of two of them. Specifically:

--Program announcements failed to clearly establish research/demonstration as the initiatives' purpose. (See pp. 11 to 13.)

--Research was not adequately incorporated into the initiatives' development and design. (See pp. 14 to 17.)

--Evaluation was not made an integral part of the initiatives. (See pp. 17 to 21.)

--Technical assistance was not always delivered to grantees. (See pp. 21 and 22.)

--The amount and type of monitoring required for research/demonstration programs were not determined. (See p. 22.)

The third initiative GAO reviewed--Violent Juvenile Offender--had a design which was more compatible with research/demonstration conditions. However, the Office cannot ensure that this will consistently occur unless it recognizes in its policies and procedures that research/demonstration and service delivery programs have different objectives and need to be operated differently. Developing such procedures takes on added significance in light of the report of the Attorney General's Task Force on Violent Crime. The Task Force's report recommends that the Attorney General ensure that adequate resources are available for research,

development, demonstration, and independent evaluation of methods to prevent and reduce serious crime. (See pp. 9, 16, and 20.)

RECOMMENDATIONS TO THE ATTORNEY GENERAL

GAO recommends that the Attorney General direct the Administrator of the Office of Juvenile Justice and Delinquency Prevention to establish policies and procedures which recognize that research/demonstration and service delivery programs should be designed and managed differently. With respect to research/demonstration initiatives, the Administrator should ensure that

--program announcements clearly establish the initiatives' purpose;

--research/demonstration initiatives are developed on the basis of research results;

--evaluation is made an integral part of research/demonstration initiatives;

--technical assistance is available to grantees, especially during key phases.

The Administrator should also determine whether research/demonstration programs should be monitored the same as service delivery programs or given closer scrutiny.

AGENCY COMMENTS

The Department of Justice commented on a draft of this report by letter dated March 3, 1982. (See app.)

The Department agreed with all of GAO's recommendations and noted that the Office of Juvenile Justice and Delinquency Prevention would develop policies and procedures for each type of programming possible under the Special Emphasis Program. However, it disagreed with GAO's conclusion that research and demonstration programs had not been adequately designed and managed by pointing out that two of the three initiatives GAO reviewed were not intended to be research/demonstration programs.

After reexamining available documentation on the two initiatives, GAO continues to believe that its position that the two initiatives were research/demonstration-oriented is well-founded. But regardless of what the initiatives were supposed to be, it is clear that there was not a common understanding among all participants of the purposes to be achieved. The corrective action promised should help to avoid confusion in the future regarding the purpose of the various special emphasis initiatives that are funded under the program. (See pp. 24 and 25.)

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ABBREVIATIONS

GAO	General Accounting Office
OJJDP	Office of Juvenile Justice and Delinquency Prevention

CHAPTER 1

INTRODUCTION

The Juvenile Justice and Delinquency Prevention Act of 1974 (42 U.S.C. 5601 et seq.) was enacted to provide the necessary resources, leadership, and coordination to

--develop and implement effective methods of preventing and reducing juvenile delinquency;

--develop and conduct effective programs to prevent delinquency, divert juveniles from the traditional juvenile justice system, and provide critically needed alternatives to institutionalization;

--improve the quality of juvenile justice in the United States; and

--increase the capacity of State and local governments and public and private agencies to conduct effective juvenile justice and delinquency prevention and rehabilitation programs and to provide research, evaluation, and training services in the field of juvenile delinquency prevention.

To administer the provisions of the act, the Congress established the Office of Juvenile Justice and Delinquency Prevention (OJJDP) within the Department of Justice.

The act authorizes Federal assistance to State and local programs through formula grants and special emphasis grants or contracts. Formula grants, which are awarded to States (and territories) generally on the basis of their relative population under age 18, are administered by the States and can be used either to assist them in planning, establishing, operating, coordinating, and evaluating projects or to provide subgrants and contracts to public and private agencies. Special emphasis grants and contracts--the subject of this report--are administered directly by OJJDP and can be awarded for various objectives specified in the legislation, including

--developing and implementing new approaches, techniques, and methods with respect to juvenile delinquency programs;

--developing and maintaining community-based alternatives to traditional forms of institutionalization;

--developing and implementing effective means of diverting juveniles from the traditional juvenile justice and correctional system;

--improving the capability of public and private agencies and organizations to provide services for delinquents and other youth to help prevent delinquency;

--developing statewide programs through the use of subsidies or other financial incentives designed to remove juveniles from jails and lockups for adults, replicate programs designated as exemplary, or establish and adopt standards for the improvement of juvenile justice within the States;

--improving the juvenile justice system to conform to standards of due process; and

--developing and implementing prevention and treatment programs relating to juveniles who commit serious crimes.

SPECIAL EMPHASIS PROGRAMS GENERALLY INVOLVE EITHER RESEARCH/DEMONSTRATION OR SERVICE DELIVERY

Although the act is not specific on the Special Emphasis Program's primary purpose, it can generally be categorized as serving the dual function of research/demonstration and service delivery. For example, the first objective listed in the act is "to develop and implement new approaches, techniques, and methods with respect to juvenile delinquency programs." This suggests a research/demonstration purpose in that it aims to create new knowledge and methodology. Another objective of the program is to "improve the capability of public and private agencies and organizations to provide services for delinquents and other youths to help prevent delinquency." Although the statement suggests research/demonstration in that funds might be used to show how agencies could more effectively provide services, it could also be interpreted as providing funds to increase services--a service delivery purpose.

The act's provisions relating to funding considerations also recognize both purposes. Among other things, the act states that the Administrator of OJJDP should consider "the extent to which the proposed program will incorporate new or innovative techniques," as well as "the increase in capacity of the public and private agency, institution, or individual to provide services to delinquents and other youth to help prevent delinquency."

Funding of program

From fiscal year 1975 through fiscal year 1981, about $223 million has been made available for special emphasis prevention and treatment programs. The money has been used to fund various programs or initiatives that usually address an issue of national scope. The following chart provides more detailed information.

Initiative	Amount awarded	Number of grants/contracts (note a)
Deinstitutionalization of status offenders	$13,835,261	22
Diversion	$11,830,605	35
School crime	$ 9,412,237	4
Prevention-youth skills development	$16,601,680	45
Restitution	$21,663,189	52
Children in custody	$ 6,640,053	6
Prevention research and development	$ 2,267,906	8
Removal of juveniles from adult jails and lockups	$ 5,558,000	1
New pride replication	$ 9,249,172	12
Violent juvenile offender	$ 4,311,998	2
Alternative education (note b)	$10,944,352	17
Youth advocacy	$13,945,936	22
Others (note c)	$51,733,161	190
Total	$177,993,550	416

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a/This figure includes refunding or continuations.

b/The amount awarded for the Alternative Education initiative includes $3,000,000 contributed by the Department of Labor's Office of Youth Programs.

c/This category includes a number of initiatives which were not targeted for major emphasis by OJJDP, such as Special Emphasis Capacity Building, Model Programs, Track II, Unsolicited (awards), and Miscellaneous Categories. These initiatives funded State and local organizations for the general purpose of preventing delinquency, developing and using alternatives to the juvenile justice system, and improving juvenile justice administration.

The National Institute of Juvenile Justice and Delinquency Prevention is the organization within OJJDP which has, among its functions, the responsibility of providing for the evaluation of juvenile delinquency programs in order to determine their results and effectiveness. The Institute awarded grants or contracts totaling $12.1 million dollars from fiscal years 1975 through 1981 to evaluate all the initiatives except Removal of Juveniles From Adult Jails and Lockups, Children in Custody, and those in the "Others" category. Agency officials told us that the two initiatives specifically mentioned above were not evaluated because they were not considered to be suitable for evaluation. Those initiatives in the "Others" category had a limited scope and similarly were not evaluated.

OBJECTIVES, SCOPE, AND METHODOLOGY

We made our review to determine how effectively and efficiently OJJDP managed the Special Emphasis Program.

At OJJDP headquarters, we initially examined records of all the special emphasis initiatives to identify specific management problems. On the basis of the problems identified, we selected three initiatives for indepth analysis--Prevention-Youth Skills Development, Alternative Education, and Violent Juvenile Offender. Grant or contract awards for these three initiatives amounted to about $31 million.

We conducted our review between December 1980 and July 1981 at OJJDP headquarters and at various other locations in the Washington, D.C. area; Baltimore, Maryland; Chicago, Illinois; New York, New York; Hackensack, New Jersey; Seattle, Washington; and various locations in California, including Los Angeles, Sacramento, San Francisco, San Raphael, Tulare, and Venice. Special emphasis grantees, evaluators, contractors, and subcontractors were located in these areas.

Each of the three initiatives we reviewed had been developed at different times and were at different phases when we started the review. This allowed us to obtain insight into OJJDP's policies, procedures, and practices since the Program's inception. The Prevention-Youth Skills Development initiative, announced in November 1976, had almost completed the implementation phase; the Alternative Education initiative, announced in February 1980, was in its first year of implementation; and the Violent Juvenile Offender initiative, announced in May 1980, had awarded contracts to two different organizations to develop and implement the initiative's two components. Another reason for selecting the Violent Juvenile Offender initiative was that OJJDP used contractors, termed National Program Coordinators,

to manage all aspects of the project including program development and design, proposal review, selection of subcontractors, and programmatic and fiscal monitoring of the projects. These functions were performed by OJJDP in previous initiatives.

The criteria for analyzing the initiatives were obtained from the Juvenile Justice and Delinquency Prevention Act and related legislative history, oversight hearings, regulations, the Program's Operation Policy and Procedures Manual, and agency studies. We also obtained additional criteria from selected studies obtained through a literature search.

At OJJDP in Washington, D.C., we interviewed numerous officials, including the Acting Administrator of OJJDP, the Director of the Special Emphasis Division, the Director of the Formula Grants and Technical Assistance Division, the Director of the National Institute of Juvenile Justice and Delinquency Prevention, and the Program Managers for the Prevention, Alternative Education, and Violent Juvenile Offender initiatives. We also reviewed the program and evaluation files for the three initiatives.

To better understand the role that private contractors had in planning and developing special emphasis initiatives, we interviewed officials and reviewed files from the American Institute for Research and from several assessment centers that are funded by the National Institute of Juvenile Justice and Delinquency Prevention. The American Institute for Research had been involved in the planning of special emphasis initiatives during the Program's early years. The assessment centers were responsible for gathering, synthesizing, and assessing information on specific juvenile delinquency issues. We visited all four assessment centers: The Assessment Center for Integrated Data Analysis; the Assessment Center for Delinquent Behavior and Prevention; the Assessment Center for Juvenile Justice Systems; and the Assessment Center for Alternatives to Juvenile Justice System Processing.

To obtain information on how well OJJDP managed the initiatives, the evaluations, and the technical assistance provided, we visited and interviewed representatives of 7 of the 15 Prevention initiative grantees and 6 of the 17 Alternative Education initiative grantees. The grantees were selected on the basis of the high levels of special emphasis funding that the States in which they were located received.

We also visited and interviewed representatives of

--the National Program Coordinators for the Violent Juvenile Offender initiative--the National Center for Crime and Delinquency and the L. Miranda Corporation;

--the evaluator of the Prevention initiative--the National Center for Crime and Delinquency;

--the evaluator for the Alternative Education initiative and its subcontractor--the Johns Hopkins University's Center for Social Organization of Schools and the Social Action Research Center, respectively;

--the evaluator for the Violent Juvenile Offender initiative--the URSA institute; and

--the technical assistance contractor for the Prevention and Alternative Education initiatives--Westinghouse National Issues Center.

Further, we interviewed by telephone the technical assistance contractors for the Violent Juvenile Offender initiative--the National Office for Social Responsibility and the Center for Community Change.

The review was performed in accordance with GAO's current "Standards For Audit of Governmental Organizations, Programs, Activities, and Functions."

CHAPTER 2

UNLESS OJJDP IMPROVES ITS POLICIES AND PROCEDURES RESEARCH/DEMONSTRATION INITIATIVES WILL ACHIEVE ONLY LIMITED RESULTS

Different studies have noted that research/demonstrations in the social arena are difficult to successfully implement and must be rigorously designed and managed. 1/ OJJDP's policies and procedures for the Special Emphasis Program do not conform to the design and management principles in that they primarily address service delivery and virtually ignore research/demonstration. As a result:

--Program announcements did not clearly establish the purpose of initiatives that were intended to be research/demonstration.

--Research was not adequately incorporated into the initiatives' development and design.

--Evaluation was not made an integral part of the initiatives.

--Technical assistance was not always provided to grantees.

--The amount and type of monitoring required for research/demonstration programs were not determined.

We examined three research/demonstration initiatives that the OJJDP has conducted under its Special Emphasis Program and found that two will produce only limited results. The third initiative may achieve better results since it had a design which was more compatible with research/demonstration conditions. However, OJJDP cannot ensure that the improvements noted in the third initiative will be consistently applied if it does not recognize in its policies and procedures that research/demonstration and service delivery programs need to be operated differently.

1/Walter S. Baer, Leland L. Johnson, Edward W. Marrow, Analysis of Federally Funded Demonstration Projects: Final Report, R-1926-DOC (Santa Monica, Ca.: Rand Corporation, 1976); The Role of Demonstrations in Federal R & D Policy (Washington, D.C.: Office of Technology Assessment, 1978); Studies in the Management of Social R & D: Selected Policy Areas (Washington, D.C.: National Academy of Sciences, 1979).

Developing management policies and procedures to ensure that research/demonstration initiatives are effectively designed and managed takes on added significance in light of the report of the Attorney General's Task Force on Violent Crime. The Task Force's report recommends that the Attorney General ensure that adequate resources are available for research, development, demonstration, and independent evaluation of methods to prevent and reduce serious crime.

OJJDP'S POLICIES AND PROCEDURES DO NOT RECOGNIZE THE NEED TO OPERATE RESEARCH/ DEMONSTRATION AND SERVICE DELIVERY PROGRAMS DIFFERENTLY

Several critical elements are involved in the successful implementation of a research/demonstration effort. In the case of OJJDP, it should conduct research on a national scope issue; develop programs on the basis of research findings; test and evaluate the program rigorously; and demonstrate it in several jurisdictions with varying characteristics to ensure successful implementation in different jurisdictions. Ideally, before a program can be implemented in different jurisdictions, it should be demonstrated and proven effective by an independent and rigorous evaluation. Service delivery programs, on the other hand, do not need the same type of testing and evaluation because their purpose is not to show that the effort can be implemented successfully nationwide on a cost effective basis. OJJDP needs to recognize the differences between the purposes--research/demonstration and service delivery--of the Special Emphasis Program.

OJJDP's Operation Policy and Procedures Manual does not address the need to operate research/demonstration and service delivery programs differently. In fact, the policies and procedures contained in the manual address primarily the Special Emphasis Program's service delivery purpose and virtually ignore research/demonstration.

The Special Emphasis Program's mission statement contained in the manual recognizes that research/demonstration is one of the Program's purposes by stating that the Special Emphasis Division's responsibility is to test, demonstrate, and implement program strategies. However, the manual does not provide any guidance on how such programs should be designed and operated. One unintended result of this omission is that the manual, by prescribing conditions that are generally suitable for service delivery, has highlighted elements that are not suitable for a research/demonstration activity. For example, the manual states that:

--Each program initiative has focused upon delivery system(s) in relation to specific categories of

juveniles to enhance accountability and measurability of program activities/services.

--Sizeable grants have been awarded for multiyear funding to support program continuity, to demonstrate Federal commitment to program approaches, and to underscore the scope of the problem thus increasing national and local attention to the problem addressed.

--Goals and objectives for implementation have been precisely defined to ensure focus and increase accountability, but program design has been left to applicants to ensure that projects would respond to local conditions.

OJJDP has funded initiatives with sizeable grants, numerous sites, and locally developed program designs--conditions that various studies do not recommend for research/demonstrations. An expensive project is not easily replicated. Further, an initiative which is conducted at numerous sites is also difficult to replicate because it is difficult to maintain the controlled environment necessary for implementation and evaluation. Moreover, allowing applicants to design their own programs without providing any additional guidance would complicate evaluation and make it difficult to determine what needs to be done to make a project work in other communities.

RESEARCH/DEMONSTRATION INITIATIVES HAVE NOT BEEN ADEQUATELY DESIGNED AND MANAGED

Two of the research/demonstration initiatives we examined were not adequately designed and managed. Our review surfaced five major areas where inadequate design and management hampered the achievement of research/demonstration. Specifically:

--Program announcements failed to clearly establish research/demonstration as the initiatives' purpose.

--Research was not adequately incorporated into the initiatives' development and design.

--Evaluation was not made an integral part of the initiatives.

--Technical assistance was not always delivered to grantees.

--The amount and type of monitoring required for research/demonstration programs were not determined.

As a result of inadequate design and management, the initiatives have encountered implementation and evaluation problems

that will limit the achievement of research/demonstration objectives.

Program announcements did not clearly establish research/demonstration as the initiatives' purpose

According to studies by the Rand Corporation and the Office of Technology Assessment, all parties involved in a demonstration program must share a common understanding of the program's purpose in order for it to be successfully implemented. 1/ OJJDP uses the program announcement as the main instrument for informing prospective grantees/contractors of an initiative's objectives. The announcement has two parts: the guidelines and the background paper. The guidelines provide such information on the initiative as: objectives, program strategy, application requirements, applicant selection criteria, and evaluation requirements. The background paper provides an assessment of current research or a theory base.

The program announcements for two of the three demonstration initiatives we reviewed did not adequately establish research/demonstration as the initiatives' purpose. However, subsequent solicitations for the evaluation of the initiatives, as well as OJJDP fiscal years 1979 and 1980 Program Plans and technical assistance documents, all identified these initiatives as demonstrations. Consequently, key parties placed priority on different purposes, causing problems during program implementation.

The program announcement for OJJDP's Prevention initiative did not identify the initiative as a demonstration and intermingled research/demonstration objectives with service delivery objectives. The Prevention initiative's objectives contained in the program announcement were

> "* * * to develop and implement new approaches, techniques, and methods to prevent juvenile delinquency in communities where youths are in great danger of becoming delinquent through improving the ability of not-for-profit youth serving agencies and organizations to implement programs which increase or expand social, cultural, educational, vocational, recreational, and health services for youth."

1/Walter S. Baer, Leland L. Johnson, Edward W. Marrow, Executive Summary for Analysis of Federally Funded Demonstration Projects, R-1925-DOC (Santa Monica, Ca.: Rand Corporation, April 1976), p. 7; The Role of Demonstrations in Federal R & D Policy (Washington, D.C.: Office of Technology Assessment, July 1978), p. 51.

The Alternative Education program announcement did identify the initiative as a demonstration, but it, too, had service delivery objectives. The program announcement for the Alternative Education initiative stated the effort was

> "* * * a major demonstration program to prevent juvenile delinquency through the development and implementation of projects designed to keep students in schools, to prevent unwarranted and arbitrary suspensions and expulsions, dropouts, pushouts, and truancy. The specific objectives are:
>
> (1) To develop and implement strategies and techniques in Alternative Education in public and private not-for-profit schools which improve those education policies, practices, and procedures which impact services to youth.
>
> (2) To upgrade the quality of existing alternative education by improving curriculum development, staff training, youth and parent participation, and administrative policies and practices of schools and school districts.
>
> (3) To reduce the number of student dropouts, truants, suspensions and expulsions in schools and school districts where these programs operate.
>
> (4) To prepare students for employment and/or successful participation in post-secondary training and education."

As these statements from the program announcements illustrate, the research/demonstration initiatives had multiple objectives, but the research/demonstration purpose was not adequately defined.

Failure to adequately establish the initiatives' purpose can lead to implementation problems because the parties responsible for implementing and evaluating the initiative may not agree on what was intended. The following problems occurred during the implementation of the Prevention initiative which illustrate this point.

--The evaluator, the technical assistance contractor, and the grantees disagreed on whether the initiative's primary purpose was demonstration or service delivery. The evaluator and the technical assistance contractor both viewed the initiative's primary purpose as demonstration while the grantees viewed it as service delivery. The grantees we interviewed told us that because

they understood the Prevention initiative's primary purpose to be service delivery, they were confused by the evaluator's attempts to establish research/demonstration requirements.

--The contractor responsible for providing technical assistance to the Prevention initiative noted in a draft of its final report that grantees were confused about OJJDP's goals for the initiative. The contractor noted that the grantees were confused because OJJDP, in emphasizing the number of youths served, appeared to support a traditional service delivery purpose for the initiative.

--The evaluator, the technical assistance contractor, and the grantees disagreed on the target group the grantees should involve. According to the evaluator, the initiative should have involved only juvenile delinquency-prone individuals in order to prove that the initiative affected delinquency. The technical assistance contractor and the grantees, on the other hand, told us the initiative should involve all juveniles.

According to the technical assistance contractor, the grantees never overcame the confusion regarding the initiative's purpose. In fact, both the evaluator and the technical assistance contractor concluded in their preliminary reports that the grantees generally provided traditional services to only a small percentage of juveniles within the initiative's target group.

Confusion also developed over the purpose of the Alternative Education initiative. For example, the evaluator, in his analysis of the grantees' proposals, noted that certain grantees lacked clear, specific objectives and evaluation components. The evaluator told us that several projects' objectives were service delivery-oriented and were too nebulous for evaluation. Officials of one grantee in the Alternative Education initiative told us that OJJDP had asked them to accomplish objectives which were not part of their grant proposal or workplan. They were concerned that their funding would be terminated because of objectives they did not adopt or agree to fulfill.

To ensure that parties responsible for implementing and evaluating an initiative share the same understanding of the initiative, the purpose must be clearly established.

Research has been missing from research/ demonstration initiatives

The OJJDP has not sufficiently incorporated research into the development and design of its research and demonstration initiatives. Research/demonstrations should be based on research findings to ensure that they are being conducted in the areas of greatest need and are properly developed and designed. 1/ Various studies have noted that a demonstration should be started after determining through research, development, and testing that the innovation to be demonstrated has a high likelihood of working. These studies noted that demonstrations which were started without such a determination were not likely to be replicated. OJJDP's program development and design process only involved research to a limited extent and, as a result, research/demonstration initiatives were: (1) implemented as demonstrations without being adequately researched and tested and (2) designed with program requirements that did not support research/demonstration objectives.

The National Institute of Juvenile Justice and Delinquency Prevention, the organization within OJJDP responsible for conducting research on juvenile justice and delinquency prevention, has had only a limited role in developing and designing special emphasis initiatives. The Director of the Institute told us that the Special Emphasis Division has involved his organization in the development and design of most special emphasis initiatives to only a limited or moderate extent.

For two of the three initiatives we reviewed indepth, the individuals hired to perform the research were not involved in program development and design. Instead, they collected data, assessed research, and prepared a background paper to support program decisions which had already been made. For example, an official with the American Institute for Research, which was responsible for planning, developing, and designing six proposed initiatives including the Prevention initiative, told us that OJJDP had already identified the initiatives and made key assumptions pertaining to those initiatives before they had an opportunity to assess the research. The officials of the assessment center responsible for analyzing available research and

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1/U.S. Department of Justice, Attorney General's Task Force on Violent Crime: Final Report, (Washington D.C.: GPO, August 1981), pp. 73-74; Michael Radnor, Robert Howard, Durward Hofler, Evaluating An Implementation Process For a Program Development System Model: Final Report to the Law Enforcement Assistance Administration, (Evanston, Ill.: Center for the Interdisciplinary Study of Science and Technology: Northwestern University, January 1979), pp. 45-46.

preparing a background paper for the Alternative Education initiative told us that their research assessment was not conducted specifically for the initiative but rather was conducted for an unrelated effort. Further, they told us that they were not involved in designing the program requirements for the Alternative Education initiative.

The following are some examples of how limiting research in program development and design can cause problems.

--Two of the three initiatives reviewed indepth were implemented as demonstrations without undergoing the first steps in the program development process--research and testing. In the Prevention initiative, improper program development may have caused the initiative to be prematurely implemented. Preliminary reports of the evaluator and the technical assistance contractor noted that the initiative had prematurely promoted delinquency prevention before the concept and strategies had been adequately researched and understood. Supporting this was the fact that after the demonstration initiative was begun, OJJDP in 1980 started an initiative entitled "Prevention Research and Development" to test specific prevention strategies. In the Alternative Education initiative, inadequate program development also caused problems with the initiative's implementation. For example, the evaluator told us that one grantee was promoting a strategy which research has shown to be harmful to juveniles. Further, the technical assistance contractor who helped redraft the guidelines told us that the original guidelines had to be redone because the OJJDP was relying on antiquated concepts proven ineffective and discarded by the Department of Education.

--In the Prevention initiative, private nonprofit organizations were required to be used to implement the initiative, but those organizations may not have been the best suited for conducting research/demonstration. Documents we reviewed indicated that this requirement was established before the research had been assessed. The preliminary reports of the evaluator and the technical assistance contractor indicated that large private nonprofit organizations may not be the best organizations to implement a demonstration since they tend to be traditional organizations with little experience assessing program impact and implementing programs in the poor, high crime, inner city areas where youth problems were considered most severe. Additionally, the evaluator noted that the assertion that private organizations

were the most capable for carrying out the initiative was not based on research.

--With the Alternative Education initiative, the background paper noted that most strategies had not been adequately tested and proven effective. Yet, the initiative's program guidelines required potential grantees to incorporate the strategies discussed in the background paper. Further, the background paper stated that the effectiveness of alternative education programs will remain unknown unless programs incorporate standardized measures, rigorous evaluation design, and adequate followup time frames. But, the program guidelines did not require them.

--With the Prevention initiative, we found that OJJDP knowingly issued a program announcement which was considered too vague and contained a program design which was insufficiently rigorous. During internal review, the Law Enforcement Assistance Administration's Office for Policy Development criticized the guidelines as being loosely drawn, not relating to the act's intent, and based on faulty assumptions. The Administrator of OJJDP acknowledged the guideline's deficiencies but stated that the deficiencies would be corrected later since they wanted to commit funds. Our analysis of the initiative indicated this vagueness was never corrected. The evaluator for the initiative told us that the vague guidelines encouraged the submission of numerous proposals which were similarly vague and lacking in rigor.

These examples illustrate how the failure to adequately base program design on research can cause the research/demonstration initiatives to be improperly developed and designed.

The design of the Violent Juvenile Offender initiative, part I, was based on research results. OJJDP involved researchers in scoping the initiative. These researchers recommended that the initiative be a research and development effort to test specific treatment strategies since so little knowledge was available on violent juvenile crime. OJJDP clearly based program requirements on the research assessment. The background paper containing the research assessment provided potential grantees with an introduction to the Violent Juvenile Offender Research and Development Program, characteristics of violent juvenile delinquency and offenders, juvenile justice responses to violent juvenile offenders, and a discussion of the evaluation model. Program requirements were linked to the model and strategies were provided. Whether part II, the Prevention component of the initiative, will be well integrated with research is uncertain. It was still in development at the time of our fieldwork.

The OJJDP needs to ensure that its research/demonstration initiatives' program development and design are based on adequate research. This is necessary so that program requirements support a research and demonstration purpose.

Evaluation has not been made an integral part of research/demonstration initiatives

The OJJDP has not made evaluation an integral part of the Special Emphasis research/demonstration initiatives. With research/demonstrations, evaluation is an indispensable aspect of the initiative since it is through the evaluation that a Federal agency can gain better knowledge, determine the program's effectiveness, and promote the replication of the programs. A study prepared for OJJDP noted that evaluation should be made an integral part of the initiative if OJJDP is to avoid repeating past errors. 1/ In the preface to that study, the Administrator of OJJDP stated that OJJDP was planning special emphasis programs according to the model discussed in the study and making research and evaluation an integral part of its special emphasis initiatives.

For two of the three initiatives we reviewed, we found that the evaluation was not an integral part of the initiative. The Prevention initiative was not a model of collaboration between the evaluator and OJJDP. Although OJJDP was more supportive of the Alternative Education initiative's evaluation, problems still existed. Specifically, we found that:

--The initiatives lacked a standard controlled program design which made them difficult to evaluate.

--The OJJDP did not adequately communicate the evaluation plan and grantees' responsibilities for implementing the evaluation.

--The initiatives lacked grant award selection factors which help weed out grantees whose projects could not be evaluated or who are not capable and interested in implementing research/demonstration initiatives.

--The OJJDP did not involve the evaluators until after the program had already been developed.

1/Department of Justice Office of Juvenile Justice and Delinquency Prevention, LaMar T. Empey, A Model for the Evaluation of Programs in Juvenile Justice, (Washington, D.C.: GPO, January 1977), p. 1.

As a result, the evaluators had difficulty conducting a credible and controlled evaluation of the initiative and determining program impact.

Initiatives lacked a standard controlled design

Establishing a standard controlled program design is necessary to successfully implement the evaluation and achieve research/demonstration objectives. An initiative's design should be sufficiently standard if the program's effectiveness nationwide is to be determined. If the initiative lacks a standard design, OJJDP may have difficulty proving that the initiative is worth replicating since the site experiencing successful results may have been effective for reasons unrelated to the program. Further, to ensure that the research/demonstration initiative generates the best data possible on program impact and its potential for replication, the program design should establish as carefully a controlled environment as possible. Specifically, various studies recommend that social experiments adopt these elements of experimental design: (1) control and treatment groups composed of randomly assigned individuals, (2) sample sizes of sufficient magnitude to enable estimates of effect with preestablished confidence levels, (3) continuance of the treatment for a sufficient amount of time for behavior adjustment, (4) observation of behavior over a sufficient time to determine the ultimate response of the treatment, and (5) administration of the experiment and collection of data in a way that does not contaminate results. These conditions, though difficult to achieve, provide the most definitive data on program effectiveness.

Both the Prevention and Alternative Education initiatives lacked a standardized program design. The initiatives' program designs, as contained in the program announcements, allowed grant applicants to develop specific implementation strategies which did not ensure that the programs could be credibly replicated. The evaluators told us that, as a result, they could not provide the best data on overall impact. This was because each project had a unique design and could not be compared.

The evaluators told us they could not obtain the most definitive data on program impact because the program requirements lacked the elements of experimental design. To obtain the best data available under the circumstances, the evaluators attempted to apply quasi-experimental techniques during program implementation. The evaluators had varying degrees of success in persuading grantees to establish control and test groups and administer a client impact questionnaire. Both evaluators told us that had the evaluations and the action programs been better integrated from the start, they would have been able to provide better data on program impact.

Better communication of evaluation requirements is needed

The OJJDP also needs to better communicate to the grantees the evaluation strategy and the grantees' responsibilities for the evaluation. The program announcements for both the Prevention and Alternative Education initiatives did not adequately describe the evaluation plan and the grantees' responsibilities. For example, the program announcements did not inform the grantees that they would have to administer a questionnaire and place the juveniles in control and test groups. OJJDP had problems conducting the evaluations. In the Prevention initiative certain grantees refused to comply with evaluation requirements. Further, in the Alternative Education initiative, the evaluation questionnaire had to be modified before certain grantees would comply. Also, two of the grantees in the Alternative Education initiative told us that they would not have applied for funding if they had known what the evaluation would entail. The grantees we interviewed told us they were not told specifically what the evaluation requirements were until they received their grant awards. They believed they should have been informed in advance of evaluation requirements.

Another example of the need for better communication involves OJJDP's requirements that grantees set aside a percentage of their grant awards for the evaluation. The program announcements for the Prevention and Alternative Education initiatives required that grantees allocate up to 10 percent and 15 percent, respectively, of their grant awards for the evaluation. The evaluators expected each grantee to set aside the full amount. The grantees we interviewed told us they were confused by the requirement and thought they were allowed to set aside any amount with the maximum specified. The OJJDP did not clarify the confusion by uniformly enforcing the program guideline's requirements.

Grant award criteria should include a factor for evaluation issues

We found that the grant award selection criteria for the Prevention and Alternative Education initiatives lacked a factor for determining whether the project could be evaluated. The evaluators for both initiatives told us that, as a result, projects selected either could not be evaluated or were inappropriate for a controlled evaluation. To successfully implement a research/demonstration initiative, the projects selected should be capable of being evaluated and, the grantees should be capable and experienced. The grant award criteria for initiatives should include a factor that will enable selection of capable grantees and grantees with projects which can be evaluated.

Evaluators were not involved until the programs had been developed

Although the evaluators were responsible for determining the impact of the special emphasis initiatives, the evaluators for two of the initiatives were not involved in key program development and design phases until after the program had been developed. Effective integration of the initiative and the evaluation requires that the evaluator be involved in key program phases before the program's inception, not afterwards. The evaluators for the Prevention and Alternative Education initiatives were not involved in key program and design decisions including defining the target group, formulating a theoretical statement of the problem, and developing a program strategy and evaluation plan. Further, they did not help to review the proposals or visit the grantees to determine whether the grantees' projects complied with the initiatives' design or would have problems obtaining data. The evaluators told us that problems evaluating the initiatives would have been minimized if they had been involved in program design, proposal review, and grant award. They believed that the work they had to perform during program implementation, such as determining which projects could be evaluated, persuading the grantees to adopt experimental designs, and installing different experimental designs to yield the best available information, could have been avoided or minimized.

The evaluation aspect was integrated better with the Violent Juvenile Offender, part I initiative. The evaluator helped: define the target population for the initiative, establish the theoretical model, develop the intervention strategy to be tested, and establish the application procedures and selection criteria. Additionally, the selection criteria took into consideration the applicant's ability to be evaluated. While part I of the initiative had not yet reached the implementation stage at the time of our fieldwork, we believe that evaluation problems will be minimized because the action program and the evaluation were better linked.

To ensure that the special emphasis initiative's impact and replication potential is supported by credible and convincing data, the OJJDP needs to make the evaluation an integral part of the initiative. It can do this by: requiring a standard, controlled program design; providing adequate information in advance on the evaluation strategy and the grantees' responsibilities; requiring that grant award procedures include a determination of whether the project can be evaluated; and encouraging selection of capable and experienced grantees. Also OJJDP can further support evaluation by devising ways to involve the evaluator in program design, proposal review, and grant award. The evaluation should not be viewed merely as a

requirement. Rather, it should be viewed as an integral part of the program. If OJJDP cannot prove that the Special Emphasis initiatives are worth replicating, then its investment in research and demonstration will have a minimal return.

Technical assistance has not always been provided

Technical assistance has not always been available to special emphasis grantees. Since research/demonstrations are difficult to implement, it is important that technical assistance be available. However, in both the Prevention and Alternative Education initiatives, we found that grantees did not receive technical assistance during key phases of the programs because of problems in awarding the contract and in coordinating OJJDP's efforts. For example:

--The technical assistance contractor for the Prevention initiative was responsible for helping to develop the strategy for implementing the initiative by providing information on promising delinquency prevention theory and practice. The contractor was also responsible for helping State and local organizations implement sound delinquency prevention programs. To accomplish this effectively, the technical assistance contractor should have been involved early. However, the contractor was not on board until the initiative had been implemented for 1 year. The technical assistance contractor told us that as a result, involvement in strategy development was minimal.

--With the Alternative Education initiative, the Program Manager was not apprised of the status of technical assistance efforts. The OJJDP planned to replace the original contractor with another firm 7 months after the program had been implemented. However, the original contract was extended because of problems encountered in awarding a contract to the other firm. The Program Manager told us she was unaware the contract had been extended or else she would have continued referring requests to the original contractor. An official of the contractor told us they were able to conduct only an assessment of the grantees' needs and would not have been able to handle additional requests because they were winding down their activities. Due to the poor coordination between the two divisions within OJJDP, the grantees did not receive any technical assistance for at least 5 months during the program's first year of implementation.

To ensure that technical assistance is available to grantees during all program phases, the OJJDP needs to better

coordinate the technical assistance contracts with the special emphasis research/demonstration initiatives.

Amount and type of monitoring needed for research/demonstration initiatives should be determined

As discussed earlier in this report, OJJDP's policies and procedures primarily address a service delivery program. Since OJJDP's policies and procedures governing monitoring also address service delivery, a question exists as to whether research/demonstration programs should be monitored in the same manner as service delivery programs or given closer scrutiny. OJJDP needs to address this issue.

Also, our review of the Prevention and Alternative Education initiatives surfaced basic problems which need to be corrected. With the Prevention initiative, no one person was responsible for assessing grantee performance and project compliance. As a result, no one made sure that quarterly reports were submitted on time or used to assess grantee performance. Our analysis of the Prevention initiative's quarterly reports shows that out of 144 reports required during the initiative's operation, 41 were late and 59 were either never submitted or not documented in agency files. Additionally, officials of one grantee told us they had not seen a grant monitor from OJJDP and, further, had no idea who their grant monitor was. To find out, we contacted the Program Manager of the Prevention initiative and several Special Emphasis grant monitors, but nobody knew who was responsible for monitoring the grant.

Our analysis of the monitoring of the Alternative Education initiative over the 6-month start up period indicated monitoring weaknesses. We found that out of 15 site visits required by the monitoring plan for the 15 Alternative Education grantees, only 6 were conducted. The Program Manager told us she could not conduct the required site visits due to travel cutbacks.

Special Emphasis Division officials acknowledged monitoring weaknesses but claimed they had been unable to monitor projects adequately because of travel cutbacks and excessive workloads. If this is the case, OJJDP should explore alternative means of keeping track of grantees' progress and problems.

CONCLUSIONS

Unless OJJDP establishes better policies and procedures, it will achieve only limited results through its special emphasis research/demonstration initiatives. We found that due to inadequate policies and procedures, OJJDP has designed and managed two of the three research/demonstration initiatives ineffectively. Specifically:

--The program announcements did not adequately establish research/demonstration as the initiatives' purpose, therefore, key parties had different views of the initiatives' purpose.

--The initiatives' development and design was not sufficiently based on research and, as a result, the initiatives were not properly developed and designed for a research/demonstration.

--The evaluations might not generate sufficiently credible and definitive data on program impact since the evaluations were not made an integral part of the initiative.

--The technical assistance to grantees was not available since the Special Emphasis Division and the Formula Grants and Technical Assistance Division did not effectively coordinate technical assistance.

--The amount and type of monitoring required for research/demonstration programs were not determined.

The design of the third and most recently developed initiative, Violent Juvenile Offender, part I, was more compatible with research/demonstration conditions which indicates progress is being made. However, OJJDP cannot ensure that progress will continue to be made so long as its policies and procedures do not recognize that research/demonstration and service delivery programs need to be operated differently.

The need for improved policies and procedures becomes more significant in light of the report by the Attorney General's Task Force on Violent Crime. The report recommends that the Attorney General ensure that adequate resources are available for research, development, demonstration, and independent evaluation of methods to prevent and reduce serious crime. Also, by clarifying its policies and procedures, OJJDP will place less of a burden on individual program managers to adequately design and manage the special emphasis initiatives.

RECOMMENDATIONS

We recommend that the Attorney General direct the Administrator of OJJDP to establish policies and procedures which recognize that research/demonstration and service delivery programs should be designed and managed differently. With respect to OJJDP's research/demonstration initiatives, the Administrator of OJJDP should ensure that:

--Program announcements clearly establish the initiatives' purpose.

--Research/demonstration initiatives are developed on the basis of research results.

--Evaluation is made an integral part of research/demonstration initiatives.

--Technical assistance is available to grantees especially during key phases.

The Administrator should also determine whether research/demonstration programs should be monitored the same as service delivery programs or given closer scrutiny.

AGENCY COMMENTS AND OUR EVALUATION

The Department of Justice commented on a draft of this report by letter dated March 3, 1982. (See app.) The Department agreed that OJJDP's policies and procedures have primarily focused upon development and implementation of service delivery programs and that research/demonstration programs need to be operated differently. It also agreed with all of our recommendations and noted that OJJDP would develop policies and procedures for each type of programming possible under the Special Emphasis program.

Although the Department agreed with our conclusion on the need for policies and procedures, it disagreed with our observation that research and demonstration programs had not been adequately designed and managed. The comments stated that this conclusion was based on reviews of three initiatives, but that two of them--Prevention and Alternative Education--were not intended to be research/demonstration programs.

With respect to the Prevention initiative, the Department justified its position on the basis that the program announcement clearly said that the initiative was intended to "increase or expand social, cultural, educational, vocational, recreational, and health services to youth." The Department stated further that research/demonstration was not mentioned in the announcement because that was not its purpose. However, the first part of the objective as stated in the announcement was "* * * to develop and implement new approaches, techniques, and methods to prevent juvenile delinquency in communities where youths are in great danger of becoming delinquent * * *." We believe that this part of the objective connotes research/demonstration.

With respect to the Alternative Education initiative, the Department's comments serve to support our position by stating that the initiative was "* * * a major demonstration program to prevent juvenile delinquency through the development of projects designed to keep students in school, to prevent unwarranted and arbitrary suspensions and expulsions, dropouts, pushouts and

truancy." Also, as pointed out on page 11 of our report, solicitations for the evaluation of both initiatives, as well as OJJDP's program plans and technical assistance documents identified the initiatives as demonstrations.

We continue to believe that our position that the two initiatives were intended to be research/demonstration-oriented was well-founded. But, regardless of what the initiatives were supposed to be, it is clear that there was not a common understanding among all participants of the purposes to be achieved. The corrective action promised by OJJDP should help to avoid confusion in the future regarding the purpose of the various special emphasis initiatives that are funded under this program.

The Department stated that facts regarding the role of the National Institute of Juvenile Justice and Delinquency Prevention were inaccurate. It noted that the Institute had assigned a staff person to share responsibility for development of each special emphasis initiative. We do not disagree with the Department that a staff member was assigned to do this. However, as noted on page 14, the Director of the Institute told us that the Special Emphasis Division had involved the Institute to only a limited or moderate extent in the development and design of most special emphasis initiatives.

The Department concurred that, research/demonstration programs should flow from research on a major issue, evaluation should be an integral part of these initiatives, technical assistance should be provided grantees, especially at key phases, and monitoring should be intensive. It also offered several comments to explain its actions or positions regarding evaluation, technical assistance, and monitoring issues discussed in our report.

The Department also noted that our recommendations appeared to lump all the initiatives together leaving the impression that the Violent Juvenile Offender initiative did not adequately establish its purpose in the request for proposals, was not based on research results, and did not make evaluation an integral part of the initiative. That was not our intent. We had noted in the draft report submitted to the Department for comment that the design of the Violent Juvenile Offender, part I initiative was compatible with research/demonstration conditions. We pointed out that to help ensure that future research/demonstration initiatives will be designed to comply with such conditions, OJJDP's policies and procedures should recognize that research/demonstration and service delivery programs need to be operated differently.

APPENDIX

U.S. Department of Justice

MAR 3 1982

Washington, D.C. 20530

Mr. William J. Anderson
Director
General Government Division
United States General Accounting Office
Washington, D.C. 20548

Dear Mr. Anderson:

This letter is in response to your request to the Attorney General for the comments of the Department of Justice (Department) on your draft report entitled "The Office of Juvenile Justice and Delinquency Prevention's Special Emphasis Program Has Not Realized Its Full Potential."

The Department agrees with all of the General Accounting Office (GAO) recommendations. The Office of Juvenile Justice and Delinquency Prevention (OJJDP) will develop policy and procedures regarding purposes and standards for each type of programming possible under the Special Emphasis Program. In responding to the draft report, our comments are categorized into two sections—one providing general comments and the other providing comments by issue.

GENERAL COMMENTS

Focus on Service Delivery

The Department agrees with GAO's overall findings that OJJDP policies and procedures have primarily focused upon development and implementation of service delivery programs, and that research/demonstration programs need to be operated differently. In the interest of perspective, OJJDP considers it important to note that GAO's conclusions do not take into account three significant facts which have directed the focus of special emphasis programming:

1) Subpart II, Section 224 (a) of the Juvenile Justice and Delinquency Prevention Act places a clear emphasis upon Congressional intent to support service delivery programs, i.e., Section 224 (a) (3), (4), (5), (7), (8), (9), (11) and (12). This thrust is further enhanced by amendments of 1977 and 1980 to Section 224 (c) which requires that 30 percent of available funds go to private nonprofit youth-serving agencies, Section 224 (d) which requires equitable distribution of funds to various categories of youth, and Section 224 (e) which requires that 5 percent of special emphasis funds be used to meet the special needs of U.S. Territories and Possessions.

2) Between 1975 and 1978, there was a dearth of reliable data upon which to base demonstration programs in delinquency prevention and treatment. It has only been as a result of new data, largely generated by the National Institute of Juvenile Justice and Delinquency Prevention (NIJJDP), that research findings are now becoming available in the areas identified by Congress for special emphasis programming. Prior to this time, programs of necessity were based upon available state of the art information.

3) Congress and the public expect that funds allocated in a given fiscal year be obligated in that fiscal year. The option of holding funds until the most reliable data become available is not a viable alternative.

Design and Management of Research/Demonstration Programs

We have difficulty with GAO's finding that research and demonstration programs have not been adequately designed and managed and do not feel that the information used supports this conclusion. GAO's conclusions are based upon in-depth reviews of three initiatives, only one of which was intended to be a research and development program, i.e., Violent Offender Part I and Part II.

1. Prevention-Youth Skills Development

Contrary to the GAO report, the program announcement for the Prevention-Youth Skills Development initiative clearly states in the program objective (page 59 of the announcement) that the program was intended to "increase or expand social, cultural, educational, vocational, recreational and health services to youth." This program was specifically designed to implement Section 224 (a) (4) of the Juvenile Justice and Delinquency Prevention Act, which requires improving the capability of public and private agencies and organizations to provide services for delinquents and other youth to help prevent delinquency. Research/demonstration was not mentioned in the announcement because that was not its purpose, and statutory provisions clearly support OJJDP funding service delivery programs.

State of the art information provided the basis for the program's strategies, but no clear prevention models were available from research in 1976 for testing. Evaluation was provided for in the program announcement, but was not made an integral part of the initiative because the evaluation grant had not been awarded when the program was announced. A level of monitoring had been established consistent with the funds expended, but other administrative priorities intervened which did not permit the planned monitoring to take place. As a result of staff shortages and turnover, several prevention grants were subject to changes in monitoring assignments, but no grant was left without an assigned monitor. Technical assistance is voluntary, and was available upon request after the technical assistance contract was awarded. Some grantees made more use of this assistance than others.

2. The Alternative Education Program

The Alternative Education Program announcement states in the objective statement that it is a major demonstration program to prevent delinquency "by preventing unwarranted and arbitrary suspensions and expulsions, dropouts, pushouts and truancy." Unlike the Violent Offender Program, it was not intended to be a research program, but one which would implement a number of promising strategies in varied school districts. The evaluation design was not an integral part of the program design because the evaluation grant had not been awarded when the program was announced. However, the goals of evaluation were stated, and grantees were required to document support for evaluation objectives. As with the prevention program, research had not validated any single model of alternative education when this program was announced, but available state of the art information was used as the basis for the program's strategies. With respect to level of monitoring, this program is subject to an extensive program development process funded through the evaluation grant, which was expressly developed to support strengthening of the objectives. It has, as an integral part, an extensive management information system. This system supports staff monitoring, and OJJDP feels that the level of monitoring currently taking place is adequate.

3. Violent Juvenile Offender Part I and II

Violent Juvenile Offender Part I and II is a research and development (R&D) program, not research demonstration as categorized in the GAO report. Its objective is to test program models based upon selected theoretical constructs. If research validates that the models being tested have merit, future demonstration programs may be appropriate. Procedures for carrying out the work are outlined in the contracts awarded for the developmental and implementation work to the National Center for Crime and Delinquency (NCCD) and L. Miranda, Associates. Both contracts provide for a high level of monitoring, technical assistance, and administrative support throughout the implementation phase.

Recommendations

As a matter of practice, over the past two years, OJJDP has moved toward implementing the recommendations of the GAO report, with increased priority given to testing program models based upon research findings. Violent Juvenile Offender Part I and Part II, developed in 1981 for implementation in 1982, the Prevention Research and Development Program, developed in 1980, and the Replication of Project New Pride, an exemplary program model being replicated in seven sites, are examples of this focus.

While GAO recognizes that the Violent Juvenile Offender Program was developed as an R&D program and that the evaluation and research requirements are stated in the background paper, the report does not point out that the R&D requirement was clearly spelled out in the Request For Proposals (RFP) which was jointly developed by OJJDP; National Council on Crime and Delinquency, program coordinator; URSA Institute, the national evaluator; and the National Office for Social Responsibility, the technical assistance contractor.

The report's recommendation section appears to lump all the initiatives together, leaving the impression that Violent Juvenile Offender Part I (1) did not adequately establish its R&D purpose in the RFP, (2) was not based on research results, and (3) did not make the evaluation an integral part of the R&D initiative. None of these conclusions apply to the Violent Juvenile Offender initiative.

OJJDP will formalize policy and procedures for development and implementation of the several categories of programming possible under Section 224 (a) within the constraints of increasingly limited staff resources and reduced travel funds, both of which will continue to impose constraints on the level of monitoring possible. Responsibility for establishing precise procedures for monitoring has been placed with contractors to help fulfill OJJDP monitoring responsibilities. NCCD has established such procedures already and the contractor for Part II is expected to do the same. Finally, OJJDP wishes to note that OJJDP priorities, as well as the expectations of Congress and the general public will continue to influence the priorities for use of funds available for special emphasis programs, and that our policies and procedures will of necessity be responsive to these concerns.

The Attorney General's Task Force on Violent Crime has recommended that R&D be viewed as an appropriate Federal function, and OJJDP will intensify its efforts to be more responsive to this view. Further, the availability of more reliable data now makes it possible to base demonstration programs upon research findings, and reduced funding makes it necessary to narrow the focus and scope of special emphasis programs.

APPENDIX

COMMENTS BY ISSUE

1. OJJDP's Policies and Procedures Do Not Recognize the Need to Operate Research/Demonstration and Service Delivery Programs Differently

OJJDP concurs that the procedures and policies provided in our Special Emphasis Operations Manual focus largely upon service delivery programs. Violent Juvenile Offender, one of three research/demonstration programs funded by OJJDP in the past seven years—the others were Prevention Research/Development and Learning Disabilities—has as part of the cooperative agreement with NCCD, specifications for development and management of Part I of this program. These specifications include all aspects of development, evaluation, monitoring and technical assistance. The contract with L. Miranda, Associates has similar provisions for Part II.

The thrust of OJJDP's special emphasis programming has focused on system change and support of national policy as reflected in the Juvenile Justice and Delinquency Prevention Act. Accordingly, most of its resources have supported alternatives to incarceration (Deinstitutionalization of Status Offenders, Diversion, Restitution, New Pride, and Jail Removal). The strategy for doing this is reflected in those elements which are identified as not being suitable for research and demonstration programs, i.e., targeting specific categories of youth, sizeable grants, multiple sites, multiple year funding, and program designs responsive to local conditions. The latter provision recognized that no single model would work in every jurisdiction, and that local support and participation in programs is directly related to the extent to which local residents feel that the program responds to conditions peculiar to their jurisdiction.

While program models have varied, OJJDP regards the enactment of state statutes and codes to allow for alternatives to incarceration, like restitution and diversion, as significant. The significance for national policy and large numbers of youth takes on added importance when these state statutory changes have been accompanied by allocation of state funds to support these alternatives.

2. Research/Demonstration Initiatives Have Not Been Adequately Designed and Managed

We take exception to the conclusion that research/demonstration initiatives have not been adequately designed and managed, as only one of the three programs examined in depth is classified by OJJDP as a research/development program, i.e., Violent Juvenile Offender Part I and Part II. The other two programs which were so classified, Learning Disabilities and Prevention Research/Development, were not examined. Therefore, the finding that the program announcements failed to establish research/demonstration as the purpose, is inappropriate to Prevention-Youth Skills and Alternative Education. Conversely, these were not conclusions made about the Violent Juvenile Offender initiative, which is a research program.

3. Program Announcements Did Not Clearly Establish Research/Demonstration as the Initiatives' Purpose

As stated above, research was not the purpose of either Prevention-Youth Skills or Alternative Education. Therefore, it would have been inappropriate to have included references to research/demonstration in the program announcement.

Prevention-Youth Skills was conceived and designed as a service delivery program to implement Section 224 (a) (4), which requires improving the "capability of public and private agencies and organizations to provide services for delinquents and other youth to help prevent delinquency"; and Section 224 (a) (c), which in 1977 required "at least 25 per centum of funds available for grants and contracts . . . to institutions who have had experience in dealing with youth." A reference on page 14 of the report, which questions the appropriateness of national youth-serving agencies implementing this program, discounts the fact that this section of the legislation, and these provisions specifically, were included for purposes of supporting national youth-serving agencies in delinquency prevention activities.

Contrary to the view of the national evaluator, NCCD, the initiative was not designed to test a theory of delinquency prevention. In retrospect, the initiative was not ideally suited to a national scope evaluation, and might more profitably have been restricted to project level evaluation. The program office monitored projects in relation to accountability for service delivery, a grant condition, and the purpose of the program.

Alternative Education was not intended to be a research program. Rather, it is a service delivery/demonstration program which states, in the program announcement, as specific objectives:

1) "To develop and implement strategies and techniques in Alternative Education . . . which improve those educational policies, practices and procedures which impact services to youth."

2) "To upgrade the quality of alternative education program . . . ."

3) "To reduce the number of student dropouts, truants, suspensions and expulsions . . . ."

4) "To prepare students for employment . . . ."

Adequate research findings were not available when the program was developed to support a research/demonstration program. The program design drew upon current state of the art information available to NIJJDP. The program was developed in response to Section 224 (a) (6) which requires that ". . . model programs and methods be developed to keep students in elementary and secondary schools." Consequently, OJJDP was interested in evaluating a number of alternative education models, as opposed to a single model, further reflecting the wide variation in the nation's school districts.

OJJDP agrees that the objectives of some alternative education projects lacked specificity. One of the specific tasks of Johns Hopkins was to work with each project to make objectives more specific. Funds were made available to grantees for this purpose.

4. Research Has Been Missing From Research/Demonstration Initiatives

Research has been incorporated in each initiative to the extent that valid research findings were available. Facts regarding the roles of NIJJDP and the American Institute for Research (AIR) in the development of special emphasis initiatives are inaccurate.

APPENDIX

1) NIJJDP has assigned a staff person to share responsibility for development of each special emphasis initiative. This person is a working member of a task group, sharing full responsibility for development of the program announcement. NIJJDP has also contracted for a background paper for each initiative, and the assigned staff person has responsibility for assuring that this information is available to support the design of the program.

2) AIR was contracted to provide state of the art work in six program areas, as a preliminary step to completing the 1977 program plan. A change in administrators resulted in shelving this work, and work on alternative education was not resumed until late in 1978, long after the AIR contract had terminated.*

5. Evaluation

Contrary to GAO's finding that evaluation is not an integral part of Alternative Education, the evaluation grant awarded to Johns Hopkins University, with a subcontract to the Social Action Research Center (SARC), provides for an extensive management information system (MIS), regular on-site visits by evaluation staff, and an extensive program development process built upon MIS data. While the program design varies in response to the peculiarities of local school conditions, Johns Hopkins has a solid evaluation design which tracks similarities, as well as differences, across programs. OJJDP feels that the results will provide useful data on what kind of alternative school models work in relation to characteristics of varied education systems. We would, however, agree that it would have been useful to have had the evaluation grant in place before the announcement was developed.

6. Technical Assistance

In both Alternative Education and Prevention, technical assistance was/is available, but was/is voluntary. Some grantees make more extensive use of it than others.

7. Monitoring

One site visit per program year, per project was planned for Prevention, but other administrative priorities intervened and the schedule was not possible. Staff shortages and staff turnover resulted in the assignment of several different grant monitors, but at no time was any Prevention grant without a grant monitor.

Similarly, one visit per school year was planned for Alternative Education, and thus far, OJJDP is on schedule with this plan. Staff monitoring is supported by monthly MIS reports, and more frequent site visits by the evaluation staff. Moreover, the evaluators conduct weekly telephone interviews with grantees to update the MIS data, and provide program progress reports to improve onsite program management. OJJDP believes that the level of monitoring is adequate on Alternative Education and, moreover, is all that our travel budget will allow.

8. Recommendations

OJJDP concurs with all of GAO's recommendations, i.e., that research/demonstration programs should flow from research on a major issue, evaluation should be an integral part of these intiatives, there should be a controlled design, and the grant award should include the program's evaluability. We also agree that technical assistance should be provided grantees, especially at key phases, and that monitoring should be intensive.

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*GAO note: The report has been clarified with respect to this comment.

These are conditions which have been met in the Violent Juvenile Offender initiative, and the procedures for these conditions are explicit in the contractual language of the cooperative agreement with NCCD and L. Miranda, Associates.

To avoid confusion in the future regarding the several categories of programming possible under special emphasis programs, OJJDP will develop policy and procedures regarding purposes and standards for each type of programming.

Should you desire any additional information pertaining to our response, please feel free to contact me.

Sincerely,

Kevin D. Rooney
Assistant Attorney General
for Administration

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